IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ALLEN HIVELY, KENNETH KNAUFF and: RANDLE SHAW, JR., individually and on behalf of all persons similarly situated, :

Civil Action No.: 2:13-cv-00106-NBF

Judge Nora Barry Fischer

ELECTRONICALLY FILED

Plaintiffs,

v.

ARCHER LIMITED, ALLIS-CHALMERS : ENERGY, INC., AIRCOMP, LLC, and ARCHER UNDERBALANCED SERVICES, : LLC

Defendants.

MOTION FOR ADMISSION PRO HAC VICE

Now COME Plaintiffs Allen Hively, Kenneth Knauff and Randle Shaw, Jr., by their counsel Berger & Montague, P.C., Shanon J. Carson and Sarah R. Schalman-Bergen, members in good standing of the Bar of the United States District Court for the Western District of Pennsylvania and attorneys with Berger & Montague, P.C., who hereby move this Honorable Court to admit David A. Hughes, *pro hac vice*, for purposes of the above-captioned action, to serve as co-counsel for Plaintiff. In support of this Motion, undersigned counsel states as follows:

- 1. David A. Hughes is a partner at Hardin & Hughes, LLP, 2121 14th Street, Tuscaloosa, Alabama 35401.
- 2. Mr. Hughes received his Juris Doctor from the University of Alabama in 1994. He is licensed to practice in, and is a member in good standing of the bar of, the State of Alabama. Mr. Hughes is also admitted to practice before the United States District Court,

Northern District of Alabama; United States District Court, Southern District of Alabama and, the United States District Court, Middle District of Alabama.

- 3. Mr. Hughes has never been subject to any discipline by any court, jurisdiction, or state.
- 4. Mr. Hughes has read and understands the Local Rules and has stated that he will comply with the Federal Rules of Civil Procedure and the applicable Local Rules.
- 5. Mr. Hughes certifies that he is a registered use of the Electronic Case Filing system in the United States District Court for the Western District of Pennsylvania.
- 6. Attached hereto as Exhibit A in support of this Motion is an Affidavit of Attorney David A. Hughes.
 - 7. A proposed Order is attached.

WHEREFORE, the undersigned, a member in good standing of the bar of this Court, respectfully moves this Court to enter an Order admitting David A. Hughes to the bar of this Court, *pro hac vice*.

Dated: March 1, 2013

Respectfully submitted,

BERGER & MONTAGUE, P.C.

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